



Gregory P. Photiadis  
James W. Gresens  
Michael J. Lombardo +  
Dennis P. Cleary  
Gary M. Kanaley \*  
Robert L. Bencini  
Patricia Gillen  
Charles C. Ritter, Jr.  
Elizabeth A. Kraengel \*\*

Barbara B. Strzemeski-Haase  
John D. Celani \*  
Steven W. Klutkowski ++  
Christopher M. Berloth  
Robert C. Carbone  
Elise L. Cassar  
Thomas D. Lyons  
Kristine N. Celeste  
Derick R. White

Matthew J. Beck  
Of Counsel

Emanuel Duke (1916-1999)  
Donald J. Holzman (1930-2017)

\* Also Admitted in FL  
\*\* Also Admitted in MA  
+ Also Admitted in PA  
++ Also Admitted in NJ

May 23, 2023

**Via CM/ECF Only**

Hon. Miroslav Lovric  
US District Court  
Northern District of New York  
Binghamton U.S. Courthouse  
15 Henry St.  
Binghamton, NY 13901

**RE: CNY Fair Housing, Inc., et al. v. Clover Group Inc., et al.  
Case No. 5:21-cv-361-BKS-ML (N.D.N.Y.)**

**\*JOINT STATUS REPORT\***

Dear Judge Lovric:

Our law firm represents the defendants in the above-action. We write to provide the Court with a joint status report on behalf of the parties pursuant to Text Order 112.

Counsel for the parties continue to confer with respect to ongoing discovery productions, with the most recent conferral having occurred on May 19. Both plaintiffs and defendants intend to complete their email productions on or about June 15, 2023, and are continuing with rolling productions of non-email documents. The parties are in the process of scheduling depositions to take place in July and August of the remaining defense witnesses sought to be deposed by plaintiffs, and of the individual plaintiffs, the executive directors of the organizational plaintiffs, and various testers identified by the organizational plaintiffs.

The parties propose the following amended scheduling deadlines:

- Plaintiffs' supplemental expert disclosures by 6/16/23
- Defendants' expert disclosures by 7/28/23
- Rebuttal expert disclosures by 8/18/23
- Fact discovery cutoff date 9/8/23
- Expert depositions by 9/29/23
- Supplemental Expert Disclosures, if any, in accordance with FRCP 26(e)
- Motions for summary judgment by 11/3/23

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Respectfully submitted,

DUKE HOLZMAN PHOTIADIS & GRESENS, LLP

*s/Elizabeth A. Kraengel*

Elizabeth A. Kraengel

[ekraengel@dhpqlaw.com](mailto:ekraengel@dhpqlaw.com)

EAK/rp

cc: Counsel of Record (via CM/ECF)